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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

NO. CR21-5287-RJB

Plaintiff,

MOTION FOR DETENTION

10

TYRON JACKSON,

Defendant.

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. 3142(e) and (f)

1. **Eligibility of Case.** This case is eligible for a detention order because this case involves (check all that apply):

- Crime of violence (18 U.S.C. 3156).
- Crime of Terrorism (18 U.S.C. 2332b (g)(5)(B)) with a maximum sentence of ten years or more.
- Crime with a maximum sentence of life imprisonment or death.
- Drug offense with a maximum sentence of ten years or more.

- 1 Felony offense and defendant has two prior convictions in the four
2 categories above, or two State convictions that would otherwise fall within
3 these four categories if federal jurisdiction had existed.

- 4 Felony offense involving a minor victim other than a crime of violence.

- 5 Felony offense, other than a crime of violence, involving possession or use
6 of a firearm, destructive device (as those terms are defined in 18 U.S.C.
7 921), or any other dangerous weapon.

- 8 Felony offense other than a crime of violence that involves a failure to
9 register as a Sex Offender (18 U.S.C. 2250).

- 10 Serious risk the defendant will flee.

- 11 Serious risk of obstruction of justice, including intimidation of a
12 prospective witness or juror.

13 2. **Reason for Detention.** The Court should detain defendant because there
14 are no conditions of release which will reasonably assure (check one or both):

- 15 Defendant's appearance as required.

- 16 Safety of any other person and the community.

17 3. **Rebuttable Presumption.** The United States will invoke the rebuttable
18 presumption against defendant under 3142(e). The presumption applies because:

- 20 Probable cause to believe defendant committed offense within five years of
21 release following conviction for a qualifying offense committed while on
22 pretrial release.

- 23 Probable cause to believe defendant committed drug offense with a
24 maximum sentence of ten years or more.

- 25 Probable cause to believe defendant committed a violation of one of the
26 following offenses: 18 U.S.C. 924(c), 956 (conspiracy to murder or
27 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).

1 Probable cause to believe defendant committed an offense involving a
2 victim under the age of 18 under 18 U.S.C. 1591, 2241, 2242, 2244(a)(1),
3 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through
4 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

4 4. **Time for Detention Hearing.** The United States requests the Court
5 conduct the detention hearing:

6 At the initial appearance
7 After a continuance of ____ days (not more than 3)

9 DATED this 3rd day of September, 2021.

10 Respectfully submitted,

11 TESSA M. GORMAN
12 Acting United States Attorney

13 */s/ Rebecca Cohen*
14 REBECCA COHEN
15 Assistant United States Attorney